

October 21, 1983

Richard P. Wilcoxon
Chief, Division of Toxic Substances Control
California Department of Health Services
1219 K Street, 3rd Floor
Sacramento, CA 95014

Dear Mr. Wilcoxon:

As you know, on August 25, 1983, EPA issued a Notice of Violation to the State pursuant to Section 3008 of the Resource Conservation and Recovery Act with respect to the BKK Landfill in West Covina. Among the violations noted by EPA is one which may significantly affect satisfactory operation of the facility; namely, deficiencies in the leachate collection system. This violation is of particular significance for bulk liquid disposal at BKK since the disposal of liquids may increase leachate.

At our meeting on September 14, 1983, I presented our analysis of the situation and suggested that it would be prudent for the State to take the precautionary measure of discontinuing shipments of large volumes of liquid wastes from Superfund sites to BKK until such time that compliance at BKK could be assured. At the time, the only such shipments of bulk liquids were coming from the Stringfellow site. Although the Stringfellow wastes contain very low levels of contamination, we were concerned about the effect of the continued placement of the large volumes of Stringfellow liquids in the BKK landfill.

On September 23 and 26, 1983, the State took action requiring correction of the leachate collection system at BKK. On October 3, 1983, the State's contractor at the Stringfellow site diverted the hauling of Stringfellow liquids to another Class I landfill.

CONCURRENCES							
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EPA is conducting a fast track feasibility study to choose a more cost effective alternative for the Stringfellow liquids. A final report is expected in January of 1984. At the same time, the State is working with BKK to return the facility to full compliance. In the interim, since the Stringfellow liquids are already being hauled to another Class I landfill, and since the status of BKK compliance with RCRA is still being resolved, I strongly recommend that the State continue to ship the Stringfellow liquids to a Class I landfill other than BKK.

Sincerely yours,

Original Signed By:

Harry Seraydarian
Director, Toxics and Waste
Management Division

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

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Sincerely yours,

A handwritten signature in dark ink, appearing to read "Harry Seraydarian". The signature is fluid and cursive, with a prominent "H" and "S".

Harry Seraydarian
Director, Toxics and Waste
Management Division

Enclosures